

SAMPLE STRATEGIC PLAN INSTITUTION EVALUATION

**PUBLIC DISCLOSURE**

(Date of Evaluation)

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

**Name of Depository Institution  
Institution's Identification Number**

**Address of Institution**

**Name of Supervisory Agency**

**Address of Supervisory Agency**

**NOTE:**      **This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.**

\* This is a sample format created to reflect the Community Reinvestment Act's requirements for written evaluations pursuant to U.S.C. 12 Section 2906 of the IBBEA for an institution operating in multiple assessment areas, in MSAs and in non-MSAs, in multiple states, including multistate MSAs. It will be adjusted, as appropriate, to reflect each institution's operations. The format assumes that the strategic plan covers the whole institution.

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## GENERAL INFORMATION

*The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.*

*This document is an evaluation of the Community Reinvestment Act (CRA) performance of **(Name of depository institution)** prepared by **(Name of agency)**, the institution's supervisory agency, as of **(date of examination)**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part xxx.*

*This institution elected to be evaluated under the strategic plan option. The plan, approved by the agency, sets forth goals for satisfactory (and outstanding, if applicable) performance.*

## INSTITUTION

**INSTITUTION'S CRA RATING:** This institution is rated \_\_\_\_\_.

Summarize the major factors supporting the institution's rating. When illegal discrimination or discouragement has been identified and has affected the rating, the summary should include a statement that the rating was influenced by violations of the substantive provisions of the antidiscrimination laws. The summary should not mention any technical violations of the antidiscrimination laws.

### CONCLUSIONS:

Summarize the facts, data and analyses that were used to determine the overall rating, based on the institution's plan goals and actual performance under the plan. The discussion should be organized broadly around the lending, investment and service goals, as applicable. If the institution has not substantially met its goals, discuss the effect, if any, changed circumstances may have on the rating. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

Write a paragraph about the institution's record of complying with the antidiscrimination laws (ECOA, FHA, or HMDA) using the following guidelines.

When substantive violations involving illegal discrimination or discouragement are found by the [Agency] or identified through self-assessment(s), state that substantive violations were found, whether they caused the CRA rating to be adjusted downward, and why the rating was or was not adjusted. Identify the law(s) and regulations(s) violated, the extent of the violation(s) (e.g., widespread, or limited to a particular state, office, division, or subsidiary) and characterize management's responsiveness in acting upon the violation(s). Determine whether the institution has policies, procedures, training programs, internal assessment efforts, or other practices in place to prevent discriminatory or other illegal credit practices.

If no substantive violations were found, state that no violations of the substantive provisions of the antidiscrimination laws and regulations were identified. Even if discrimination has not been found, comments related to the institution's fair lending policies, procedures, training programs and internal assessment efforts may still be appropriate. If applicable, technical violations cited in the report of examination should be presented in general terms.

## MULTISTATE METROPOLITAN AREA

**CRA RATING FOR (Name of MULTISTATE METROPOLITAN AREA):** \_\_\_\_\_

*[Complete for each multistate metropolitan area where an institution has branches in two or more states within the multistate metropolitan area.]*

Summarize the major factors supporting the institution's multistate metropolitan area rating. When illegal discrimination or discouragement has been identified and has affected the rating, the conclusion should include a statement that the rating was influenced by violations of the substantive provisions of the antidiscrimination laws. The conclusion should not mention any technical violations of the antidiscrimination laws.

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE IN (Name of MULTISTATE METROPOLITAN AREA):**

Discuss the institution's CRA performance within the multistate metropolitan area. The facts, data and analyses that were used to form a conclusion about the rating, as well as the institution's record in assessment areas in the multistate metropolitan area that were examined using the limited examination procedures, should be reflected in the narrative. The discussion should be based on the institution's plan goals and actual performance under the plan, and organized around the lending, investment and service goals, as applicable. If the institution has not substantially met its goals, discuss the effect, if any, changed circumstances may have on the rating. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

If the institution's assessment area(s) are smaller than the boundaries of the multistate metropolitan area, a discussion of the assessment areas examined should be included. Refer to the assessment area discussion, below.

## STATE

**CRA RATING FOR (Name of STATE):** \_\_\_\_\_

*[If the institution has branches in more than one state, complete this section for each state. Otherwise, complete the Metropolitan Area and Non-Metropolitan Statewide Area presentations only, as applicable.]*

Summarize the major factors supporting the institution's state rating. When illegal discrimination or discouragement has been identified and has affected the rating, the conclusion should include a statement that the rating was influenced by violations of the substantive provisions of the antidiscrimination laws. The conclusion should not mention any technical violations of the antidiscrimination laws.

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE IN (Name of STATE):**

Discuss the institution's CRA performance within the state. The facts, data and analyses that were used to form a conclusion about the rating, based on the institution's plan goals and actual performance under the plan, should be reflected in the narrative. The discussion should be organized around the lending, investment and service goals, as applicable. If the institution has not substantially met its goals, discuss the effect, if any, changed circumstances may have on the rating. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

## **METROPOLITAN AREAS**

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE IN *(Name of METROPOLITAN AREA AND STATE)*:**

Discuss the institution's CRA performance within the metropolitan area. The facts, data and analyses that were used to form a conclusion, as well as the institution's record in assessment areas in the metropolitan areas that were examined using the limited examination procedures, should be reflected in the narrative. The discussion should be based on the institution's plan goals and actual performance under the plan, and organized around the lending, investment and service goals, as applicable. If the institution has not substantially met its goals, discuss the effect, if any, changed circumstances may have on the rating. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

If the institutions assessment area(s) are smaller than the boundaries of the metropolitan area, a discussion of the assessment areas examined should be included. Refer to the assessment area discussion, below.

## **NON-METROPOLITAN STATEWIDE AREAS**

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN *(Name of NON-METROPOLITAN STATEWIDE AREA)*:**

Discuss the institution's CRA performance within the non-metropolitan statewide area. The facts, data and analyses that were used to form a conclusion, as well as the institution's record in assessment areas in the non-metropolitan statewide area that were examined using the limited examination procedures, should be reflected in the narrative. The discussion should be based on the institution's plan goals and actual performance under the plan, and organized around the lending, investment and service goals, as applicable. If the institution has not substantially met its goals, discuss the effect, if any, changed circumstances may have on the rating. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

A discussion of the assessment areas examined using the full examination procedures should be included. Refer to the assessment area discussion, below.

## ASSESSMENT AREA

*(for each assessment area examined using the full examination procedures)*

Charts or tables may be useful in depicting information throughout the assessment area presentation.

### DISCUSSION OF PERFORMANCE IN (ASSESSMENT AREA NAME):

**[Repeat for each assessment area.]**

STRATEGIC PLAN GOALS AND ACTUAL PERFORMANCE FOR EDEN PRAIRIE AND DAVIS COUNTIES IN MINNESOTA TO OBTAIN SATISFACTORY RATING		
Sample	Strategic Plan Goal	Actual Performance
	1 . \$1.5 million in small farm loans	1. \$1.32 million in loans
	2. \$2.0 million in loans to small businesses	2. \$3.7 million in loans.
	3. \$.5 million in loans to start-up businesses	3. \$.39 million in loans.
	4. Provide construction/permanent financing for 24-unit elderly low-income housing project	4. Construction line of credit approved for \$960,000. \$100,000 disbursed to date.

Summarize the facts, data and analyses that were used to form a conclusion on the institution's performance in the assessment area. This should compare and contrast the institution's plan goals for the assessment area and actual performance under the plan. Explain variances between the plan and actual results. If the institution has not substantially met its goals, discuss the performance context and its impact on the conclusion. The discussion should be organized around the lending, investment and service goals, as applicable. Use the chart above to supplement the written summary, and note whether the analysis was



conducted using full examination procedures.

## **ASSESSMENT AREA**

*For those assessment areas that were examined using the limited examination procedures: (multiple assessment areas within the same multistate metropolitan area, metropolitan area, or non-metropolitan statewide area and not examined using the examination procedures, may be combined into one presentation.)*

Charts or tables may be useful in depicting information throughout the presentation.

### **DISCUSSION OF PERFORMANCE IN (*Name of ASSESSMENT*):**

Summarize the facts and data that were reviewed and indicate whether the institution's performance in the area reviewed is consistent with the institution's record in the multistate metropolitan area, metropolitan area, or non-metropolitan statewide area.

## APPENDIX A

### SCOPE OF EXAMINATION

Write a short description of the scope of the examination. At a minimum, discuss the specific products reviewed, the names of affiliates reviewed and their corresponding products, the institution's assessment areas and whether its activities in the assessment areas were reviewed using the examination procedures, and the time period covered in the review.

Charts that illustrate the scope of the examination may be useful for large institutions with multiple assessment areas or institution's that use data from their affiliates. Charts, such as the ones below, may be used as a supplement to the discussion of the scope or in lieu thereof.

<b>SCOPE OF EXAMINATION</b> [SAMPLE]			
[Note: Example provided for clarity]			
<b>TIME PERIOD REVIEWED</b>	1/1/95 TO 6/30/96		
<b>FINANCIAL INSTITUTION</b> XYZ National Bank, Eden Prairie, MN			<b>PRODUCTS REVIEWED</b> Small Business Small Farm
<b>FINANCIAL INSTITUTION/ AFFILIATE</b>	<b>AFFILIATE RELATIONSHIP</b>		<b>PRODUCTS REVIEWED</b>
XYZ Bancorp, Blue Earth, MN	Holding Company		Investments
XYZ Community Development Corporation, Blue Earth, MN	Holding company subsidiary		Investments
XYZ Savings Bank, Blue Earth, MN	Thrift - Holding company subsidiary		Mortgage lending
XYZ National Bank, Tampa, FL	Holding company subsidiary		Credit Cards

<b>LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION</b>			
<b>ASSESSMENT AREA</b>	<b>TYPE OF EXAMINATION</b>	<b>BRANCHES VISITED</b>	<b>OTHER INFORMATION</b>
MINNESOTA  Davis County and Eden Prairie County (contiguous counties)	Full exam procedures		
FLORIDA  City of Tampa	Ltd. exam procedures		

APPENDIX B

**SUMMARY OF STATE AND MULTISTATE METROPOLITAN AREA RATINGS**

State or Multistate Metropolitan area Name	State Rating